

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

DEUTSCHE BANK TRUST COMPANY
AMERICAS, in its capacity as successor
indenture trustee for certain series of Senior
Notes, *et al.*,

Plaintiffs,

v.

SOWOOD ALPHA FUND LP, *et al.*,

Defendants.

C.A. No. 11-618 GMS

MOTION AND ORDER FOR ADMISSION PRO HAC VICE

Pursuant to Local Rule 83.5 and the attached certifications, counsel moves the admission *pro hac vice* of Robert J. Lack, Hal Neier, Amy C. Brown and Ricardo Solano Jr. to represent the Plaintiffs in this matter with respect to claims asserted against Shareholder Defendants Absolute Alpha Fund LLP; Agile Nexus Multi Strategy Fund SPV 1, LLC; Agile Nexus Multi Strategy Fund SPV I, LLC; Mellon Bank N.A. Employees Benefit Collective Investment Plan; BNY Mellon Trust of Delaware; John Doe, as Trustee of BNY Mellon Trust of Delaware; Symetra Financial Corporation; John Doe, as Owner of Vanguard Bal Index Equity; John Doe, as Owner of Vanguard Consumer Discretionary Index Fund; John Doe, as Owner of Vanguard FTSE Social Index Fund; John Doe, as Owner of Vanguard Group A/C xxxx8-00-K/Instl Index; John Doe, as Owner of Vanguard Growth & Income Fund; John Doe, as Owner of Vanguard High Dividend Yield Index Fund; John Doe, as Owner of Vanguard Index 500 Fund; John Doe, as Owner of Vanguard Institutional Total Stock Market Index Fund; John Doe, as Owner of Vanguard Large Cap Index Fund; John Doe, as Owner of Vanguard Mid-Cap Index Fund; John Doe, as Owner of Vanguard Mid-Cap Value Index Fund; John Doe, as Owner of Vanguard

Structured Large-Cap Equity Fund; John Doe, as Owner of Vanguard Tax Managed Growth & Income Fund; John Doe, as Owner of Vanguard Total Stock Market Index Fund; John Doe, as Owner of Vanguard Value Index Fund; John Doe, as Owner of Vanguard VVIF Equity Fund Index; John Doe, as Owner of Vanguard VVIF Equity Income VGI; John Doe, as Owner of Vanguard VVIF-Mid-Cap Index Fund; John Doe, as Owner of Windsor II Vanguard; The Vanguard Group, Inc.; The Vanguard Group Ltd.; Vanguard Asset Allocation Fund, Inc; Vanguard Balanced Index Fund, Inc.; Vanguard Equity Income Fund, Inc.; Vanguard Fenway Funds; Vanguard Fiduciary Trust Company; Vanguard Index Funds; Vanguard Institutional Index Fund; Vanguard Institutional Index Funds; Vanguard Malvern Funds; Vanguard Quantitative Funds; Vanguard Tax-Managed Funds; Vanguard Valley Forge Funds; Vanguard Variable Insurance Funds; Vanguard Whitehall Funds; Vanguard Windsor Funds; and Vanguard World Fund. Pursuant to this Court's Standing Order effective July 23, 2009, a check in the amount of \$100.00 is included to cover the annual fees for the attorneys listed above.

ASHBY & GEDDES

/s/ F. Troupe Mickler IV

Philip Trainer, Jr. (DE #2788)
Andrew D. Cordo (DE #4534)
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Attorneys for Plaintiffs

Dated: October 12, 2011

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

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AMERICAS, in its capacity as successor
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ORDER

This _____ day of _____, 2011, the Court having considered the motion for the admission *pro hac vice* of Robert J. Lack, Hal Neier, Amy C. Brown and Ricardo Solano Jr. to represent the plaintiffs, Deutsche Bank Trust Company Americas, *et al.*, in the above action; now therefore,

IT IS HEREBY ORDERED that counsel's motion is granted, and that the foregoing attorneys are admitted *pro hac vice*.

Chief Judge

CERTIFICATION BY COUNSEL TO BE ADMITTED *PRO HAC VICE*

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court, that I am admitted, practicing, and in good standing as a member of the Bar of the State of New York, and, pursuant to Local Rule 83.6, that I submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules.

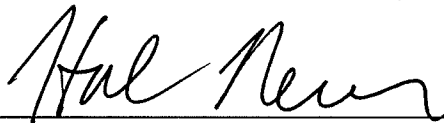


Robert J. Lack
FRIEDMAN KAPLAN SEILER & ADELMAN LLP
7 Times Square
New York, New York 10036
(212) 833-1100

Dated: 10/4/11

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Hal Neier
FRIEDMAN KAPLAN SEILER & ADELMAN LLP
7 Times Square
New York, New York 10036
(212) 833-1100

Dated:

10/11/11

CERTIFICATION BY COUNSEL TO BE ADMITTED *PRO HAC VICE*

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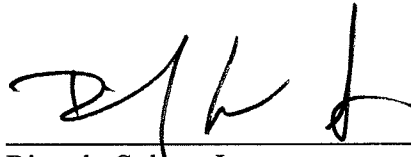


Amy C. Brown
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7 Times Square
New York, New York 10036
(212) 833-1100

Dated: 10/11/11

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A handwritten signature in black ink, appearing to read 'R. Solano Jr.', is written over a horizontal line.

Ricardo Solano Jr.
FRIEDMAN KAPLAN SEILER & ADELMAN LLP
7 Times Square
New York, New York 10036
(212) 833-1100

Dated: 10.11.11